

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

KELLY BLAND, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LIGHTBEAM LENDING INC. AND
CLEAN ENERGY ASSOCIATES, LLC

Defendants.

Case No. 4:24-cv-00595

JURY TRIAL DEMANDED

RESPONSE TO NOTICE OF IMPENDING DISMISSAL

COMES NOW Plaintiff Kelly Bland, by and through the undersigned counsel, and hereby respectfully files this response to the Court's Notice of Impending Dismissal (ECF No. 6). In response thereto, the Plaintiff avers that Defendant Lightbeam Lending Inc., was properly served while the summons was still active and within the provisions of Rule 4(m). As the Defendant has failed to respond, the Plaintiff filed a Motion for Clerk's Entry of Default today. (ECF 8). When the default is entered, the Plaintiff intends to proceed accordingly and may file an Amended Complaint naming Lightbeam's owner personally. Plaintiff respectfully requests that this case not be dismissed as to Lightbeam Lending, as it was properly served, but is in default.

CONCLUSION

WHEREFORE, for the reasons set forth herein, the Plaintiff respectfully requests that the Court allow this case to remain open and not dismiss it for failure to prosecute.

RESPECTFULLY SUBMITTED AND DATED this January 13, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
Perrong Law LLC
2657 Mount Carmel Avenue

Glenside, Pennsylvania 19038
Phone: 215-225-5529 (CALL-LAW)
Facsimile: 888-329-0305
a@perronglaw.com

Attorney for Plaintiff and proposed class

CERTIFICATE OF SERVICE

I certify that I filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case.

I further certify that I mailed a copy of the foregoing to:

Lightbeam Lending Inc.
c/o: Sameer Sethi
427 Walnut Dr.
Murphy, TX 75094
Tracking Number: 00310903331480001206

Dated: January 13, 2025

Respectfully submitted,
/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.